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September 25, 2020

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Abbott Laboratories v. Carol Feinberg, Case No. 18 Civ. 8468 (LGS)**

Dear Judge Schofield,

We write on behalf of Plaintiff Abbott Laboratories (“Abbott”) under Section I.D.3 of the Court’s Individual Rules and Procedures for Civil Cases to respectfully request the Court’s permission to file Abbott’s September 25, 2020, Proposed Findings of Fact and Conclusions of Law in redacted form and under seal. These redactions are narrowly tailored to maintain confidentiality of the identity of various artworks, including the Painting at issue in this action.

The parties agreed at the outset of this case—consistent with the practice in many high-end-art disputes—to redact the identity of the artist and the title and description of the Painting at issue to avoid further casting a cloud on its title. This Court previously allowed such redactions that were “narrowly tailored and necessary to prevent the disclosure of information that could unnecessarily impair the value of the artwork.” (March 2, 2020, Order, Dkt. No. 108; *see* August 28, 2019, Order, Dkt. No. 72; August 21, 2019, Order, Dkt. No. 70; May 13, 2019, Order, Dkt. No. 46.) For these same reasons, Abbott again seeks the Court’s permission to redact the identity of the Painting, as well as several other artworks.

Respectfully submitted,

Judd B. Grossman

The application is GRANTED. Plaintiff may file its Proposed Findings of Fact and Conclusions of Law in redacted form and under seal. The Court has reviewed the materials, and the proposed redactions are narrowly tailored to prevent the disclosure of information that could impair the value of the artwork at issue, as well as other artworks. *See, e.g., CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 14 Civ. 1897, 2017 WL 4750701, at \*4 (D. Conn. July 12, 2017) (allowing for redactions of “commercially sensitive” information).

SO ORDERED

Dated: September 28, 2020  
New York, New York

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE